

REDACTED
EXHIBIT A

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1 THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

4 _____)
5 HEADWATER RESEARCH, LLC,)
6 Plaintiff,)
7 vs.) Case No.
8) 2:22-CV-00422-RG-RSP
9)
10)
11)
12)
13)
14 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
15 DEPOSITION OF GREGORY RALEIGH, PH.D.
16 WEDNESDAY, NOVEMBER 15, 2023
17 LOS ANGELES, CALIFORNIA
18
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24 REPORTED BY: JEANINE CURCIONE
CSR NO. 10223, RPR
25

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1 Deposition of GREGORY RALEIGH, PH.D., taken on behalf
2 of Defendants, at 8:59 A.M., Wednesday, November 15,
3 2023 at 12424 Wilshire Boulevard, 12th Floor, Los
4 Angeles, California, before Jeanine Curcione, C.S.R.
5 No. 10223, RPR, pursuant to notice.

6

7 APPEARANCES OF COUNSEL:

8 FOR THE PLAINTIFF:

9 RUSS AUGUST & KABAT
10 BY: MARC FENSTER, ESQ.
11 BY: REZA MIRZAI, ESQ.
12 BY: JASON M. WIETHOLTER, ESQ.
13 12424 Wilshire Boulevard
12th Floor
Los Angeles, California 90025
Phone: (310) 826-7474
e-mail: mfenster@raklaw.com

14 FOR THE DEFENDANTS:

15 FISH & RICHARDSON
16 BY: JARED HARTZMAN, ESQ.
17 BY: THAD C. KODISH, ESQ.
18 1180 Peachtree Street NE
Floor 21
Atlanta, Georgia 30309
Phone: (404) 892-5005
e-mail: hartzman@fr.com

19

20 ALSO PRESENT:

21 STEFFEN LAKE, ESQ. (VIA ZOOM)
22 TRAVIS SIMMONS, VIDEOGRAPHER

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1 QUESTIONS NOT ANSWERED

2	PAGE	LINE
3	8	4
	8	11
4	123	15

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09:01:31 17 MR. HARTZMAN: This is Jared Hartzman from
09:01:31 18 Fish and Richardson representing the Samsung
09:01:36 19 defendants and with me today is my colleague Thad
09:01:39 20 Kadish.

09:01:41 21 MR. FENSTER: Good morning. My name is
09:01:42 22 Marc Fenster with Russ August and Kabat on behalf of
09:01:45 23 the plaintiff Headwater and the witness. With me
09:01:45 24 today are my partners Reza Mirzaie and Jason
09:01:45 25 Wietholter.

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09:01:52 1 THE VIDEO OPERATOR: Thank you. The court

09:01:53 2 reporter please administer the oath.

09:01:55 3

09:01:55 4 GREG RALEIGH, PH. D.,

09:01:55 5 having been duly affirmed, was

09:01:55 6 examined and testified as follows:

09:01:55 7

[REDACTED]

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[REDACTED]

09:34:10 8 Q. Do you have any knowledge of programming
09:34:12 9 languages?

09:34:12 10 A. Yes.

09:34:13 11 Q. Are you fluent in any?

09:34:15 12 A. Today? It was a while ago since I've
09:34:20 13 coded. Early in my career I was a coder to do
09:34:26 14 various things in my projects but it's been a long
09:34:29 15 time since I worked at that level.

09:34:32 16 Q. What program languages were you fluent in?

09:34:36 17 A. Okay. Fortran, CPlusPlus, Basic, Visual
09:34:42 18 Basic, assembly language, a little bit of work with
09:34:48 19 Python here and there. I mean, you know, the
09:34:54 20 programming language was never that important to me.
09:34:57 21 It was principles of computer science that were more
09:35:01 22 important. You know the principles of computer
09:35:03 23 science you know how to write code you can program
09:35:07 24 in any language.

09:35:12 25 Q. When was the last time you coded?

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09:35:15 1 A. I still code a little bit in MATLAB, which
09:35:21 2 is another sort of language. M-A-T-L-A-B. So I
09:35:24 3 still code a little bit in that.

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Category	Percentage
1	95
2	85
3	75
4	90
5	80
6	98
7	88
8	70
9	65
10	55

12:15:53 9 Q. I'll rephrase. By 2010 were you familiar
12:15:58 10 with the Android operating system?

12:16:01 11 MR. FENSTER: Object to form.

12:16:02 12 THE WITNESS: You know, okay, generally
12:16:05 13 familiar. I'm not sure what familiar means. I was
12:16:09 14 certainly aware of Android. I knew some of the
12:16:12 15 features. [REDACTED]

12:16:12 | 15 features. [REDACTED]

A horizontal bar chart with 16 positions on the y-axis. The x-axis represents length, with major tick marks at 0, 25, 50, 75, and 100. Positions 1, 3, 6, 7, 10, 11, 12, 13, 14, and 15 have no visible bars. Positions 4, 5, 8, and 9 have very short bars. Positions 2 and 16 have the longest bars, extending nearly to the 100 mark on the x-axis.

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A horizontal bar chart consisting of 15 black bars of varying lengths. The bars are arranged in two columns: a left column with 7 bars and a right column with 8 bars. The bars are ordered from longest to shortest from top to bottom. The first bar in the right column is the longest, followed by the first bar in the left column, and so on. The bars are separated by small gaps and are set against a white background.

12:26:46 14 MR. HARTZMAN: I think now is a good time

12:26:47 15 for a break.

12:26:49 16 MR. FENSTER: Sure.

12:26:50 17 THE VIDEO OPERATOR: Off the record at

12:26:52 18 12:25:

12:26:53 19 (At the hour of 12:25 P.M., there was a

12:26:53 20 Luncheon recess taken)

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12:26:53 1 (At the hour of 1:07 P.M., the
12:26:53 2 deposition was resumed.)

12:26:54

EXAMINATION (RESUMED)

01:09:08 5 THE VIDEO OPERATOR: We're back on the
01:09:09 6 record at 1:07.

01:09:14 7 BY MR. HARTZMAN

██████████ | ██████████

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11. **What is the primary purpose of the *Journal of Clinical Endocrinology and Metabolism*?**

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11. **What is the primary purpose of the *Journal of Clinical Endocrinology and Metabolism*?**

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